

EXHIBIT K



FARR LAW FIRM

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April 24, 2021

Seth A. Goldberg
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30 South 17th Street
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Re: ZHP Document Production

Dear Mr. Goldenberg:

Plaintiffs have obtained information through the course of the ZHP witness depositions which makes clear that certain sources of highly relevant information have not been produced. The following is a list of items Plaintiffs request that Defendants search and produce:

1. Production of custodial files for all parties to the July 27, 2017 email (ZHP00190573):
 - a. Jinsheng LIN
 - b. Jucai GE
 - c. Tianpei HUANG
 - d. Wangwei CHEN
 - e. Wenquan ZHU
 - f. Wenbin CHEN
 - g. Min LI
 - h. Peng DONG
 - i. Lihong LIN
 - j. Yanfeng LIU
 - k. Peng WANG
 - l. Wenling ZHANG
2. Production of the custodial file for Xiaofang (Maggie) Kong.
3. The addition of the following search terms to be searched across all custodians:
 - a. Zhejiang Second Pharma
 - b. CN103613558A

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- c. Impurity K
 - d. NALCO
 - e. Hypochlorite
4. Documents related to TC-201729 (the Irbesartan improvement project discussed in the July 27, 2017 email) (*see* ZHP02636960).
5. All copies, including drafts, of the report identified at tab 3, row 54 of ZHP01391683, wherein it indicates that “[a]fter discussion with Li, the project was not updated because the impurities involved were sensitive.”
6. Production of custodial files for individuals involved in the testing, drafting, and preparation of above-reference report, including but not limited to:
 - a. Huang Tianpei
 - b. Li Dan
7. Valsartan impurity testing performed at or around March of 2017 for impurities found at 2.9, 4.4, and 5.5 min (*see* ZHP01838590, ZHP02333049).
8. Plaintiffs request unredacted copies of ZHP01838590 and ZHP02333049 with working document hyperlinks.
9. Emails authored, sent, or received by Peng Dong prior to December 12, 2017.
10. Litigation hold letters sent to all custodians including records demonstrating what devices were subject to the litigation hold for each custodian.
11. Records identifying the process by which the collection of devices and data was carried out pursuant to the litigation hold, including when performed and by whom.
12. All records, including personnel files if necessary, associated with broken company issued cell phones and/or laptop computers for all custodians, including the date of occurrence and when and how the device was replaced, and location and status of the broken device. This includes, but it not limited to:
 - a. Complete documentation associated with Min Li’s broken Lenovo ThinkPad and Samsung Phone, including when the devices were rendered unusable, what steps were taken to retrieve information from the devices, what information was recovered from the devices and what information was destroyed, onto what device the recovered information was transferred and on which date the transfer occurred, and the location and status of the broken devices.

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13. Emails, notes, calendar entries, and meeting minutes from internal ZHP meetings for all custodians associated with the discovery of NDMA in ZHP's sartans. This includes but is not limited to:
- a. The approximately 5-9 meetings Min Li attended with Baozhen Chen;
 - b. QC department meetings organized or attended by Qiangmin Li.
14. All records associated with the March 12, 2018 testing investigation of valsartan API Batch No. C55-18-053M, including but not limited to all GC-MS testing data and cGMP documentation associated with the investigation.
15. The November Deviation Investigation Report (PRINSTON0075797) says at page 35-36 that 7000 batches were tested after June 5, 2018. We do not see that volume of testing in the production—including references to a batch with 240ppm contamination. As such, Plaintiffs request the complete production of all batch testing records. To the extent you claim it has already been produced, please affirmatively identify the Bates ranges for such testing.

Plaintiffs are available to meet and confer regarding these requests on Monday, April 26. It should come as no surprise to you that there is urgency to these requests in light of the upcoming ZHP depositions. Accordingly, if you are unable to meet and confer on Monday regarding this matter, Plaintiffs intend to place this issue on the agenda for the Court's April 28, 2021 discovery conference.

If you have any questions or concerns regarding the above information, please do not hesitate to contact my office.

Respectfully,



George T. Williamson
For the Firm

GTW/jb